

DEBORAH J. BLUM, ESQ.

225 Broadway, Suite 715 • New York, NY 10007

Patrick Fan, MBA *Legal Intern*
Ariella Ruben *Legal Assistant*

T • (646) 535-2586
M • (845) 304-5312
F • (212) 409-8279

November 14, 2024

Via CM/ECF

The Hon. Judge Nicholas G. Garaufis
Senior District Court Judge
United States District Court for The Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA
Case Nos. 1:18-CR-00204 & 24-CV-02925
Extension of Time to Amend Pro Se Motion to Vacate Under 28 U.S.C. §
2255 – Unoposed

Dear Hon. Judge Garaufis:

My office represents Keith Alan Raniere (hereinafter referred to as “Mr. Raniere”) in his 2225 application which is pending before Your Honor. The Court granted my office’s last request for an extension of time to amend the 2255, [1268], to November 21st, 2024. At this time, I am asking for an additional week, 7 days, to November 28th, 2024 to file the amended 2255. AUSA Tanya Hajjar has consented to this request.

I am asking this Honorable Court to grant this request as I have been unable to have additional in person visitation with Mr. Raniere to finalize the amended 2255. I have made every possible effort to secure visitation prior to the November 21st deadline. The reason why Your Honor granted my last request to extend the deadline was to allow me to have another visit with Mr. Raniere; which has not taken place yet, despite my best efforts to secure visitation.

As I previously apprised the Court, my last visit with Mr. Raniere was cut short due to me being denied access to the facility, USP Tucson. It is necessary for me to have a final visit with Mr. Raniere to review his draft declaration and obtain his signature on it, as well as for him to review the proposed filing. I do not feel comfortable mailing him the proposed filing as his mail has been compromised in the past and I need to speak with him in private, not on a recorded legal prison call.

Mr. Raniere has a new correctional counselor who was out for the past 2 weeks and first engaged with me today regarding my request to visit. I am awaiting a responsive email to solidify the date of visitation. The facility has been aware, since October 23rd, 2024, that I would be seeking an additional visit and it was agreed that it would be facilitated.

Thank you very much in advance for this Honorable Court's consideration of this request. I am happy to provide any additional details regarding this request. I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com.

Very truly yours,



Deborah J. Blum

Via Email
cc: Joseph Reccoppa
Courtroom Deputy to
The Hon. Judge Nicholas G. Garaufis

Tanya Hajjar, Esq.
United States Attorney's Office for The Eastern District of New York

**Application granted.
So Ordered.**

s/Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: 11/18/24